

March 30, 2006

Sue Inches, Deputy Director
Maine State Planning Office
38 State House Station
Augusta, Maine 04333

Re: Draft "Review of State Solid Waste Management Policies"

Dear Sue,

Please accept this letter as the comments the Maine Municipal Association with regard to the draft executive summary of the "Review of State Solid Waste Management Policies" document ("Draft"). This letter does not necessarily represent the individual views of the municipal officials who participated in the Task Force meetings.

Here are some general comments:

Recommendation #1: **Qualified Support.**

MMA Comment: Twice a year may be a bit much. MMA absolutely supports meeting more than once every five years.

MMA would encourage an annual meeting in the Fall prior to cloture.

Recommendation #2: **Support.**

Recommendation #3: **Support.**

MMA Comment: On page 3, the Draft states that "The State Planning Office endorses moving beyond our 50% recycling goal." Then on page 4, Policy Recommendation #3 says: "Maintain the 50% recycling goal and add a policy statement that favors waste reduction, maximizes waste diversion and maximizes the use of solid waste generated in Maine for its energy or resource value."

I believe that municipalities would support Recommendation #3, I am less certain they would support increasing the 50% goal as a stand-alone recommendation. The meeting notes reflect a wide-ranging discussion on recycling and fairly broad support for doing more in terms of recycling effort. I don't remember any broad support for increasing the goal above 50%. Further, the meeting notes include a long list of potential changes and actions with respect to recycling. Again, I don't see any supporting changing the goal above 50%.

As the Draft notes, the EPA estimates that Maine is the top recycling state in the country (49%). Municipalities could potentially support moving beyond the 50% goal, but only if Maine dropped its cockamamie calculation process which includes CDD waste. Further, this change would allow SPO to drop its 2-books approach to recycling rates whereby you report both the Maine formula's conclusion of the recycling rate (35%) and EPA's (49%).

MMA asks SPO to consider supporting legislation that would drop Maine's unique recycling rate formula and adopt the EPA method instead.

Recommendation #4: **Support.**

Recommendation #5: **Support.**

Recommendation #6: **Qualified Support.**

MMA Comment: It would be nice to have as comprehensive a report as this, but it appears a bit ambitious.

MMA would urge you to focus the report on a few issues, particularly those that either the task force identified and/or that the legislature most often deals with. MMA would urge that the following issues be included in the study, none of which were specifically mentioned in the Draft.

- a. **Material Bans.** The legislature spends a great deal of time debating bills that would ban a particular product or substance. The Portland Press Herald recently did a long story and an editorial on the topic. The costs and benefits of the current system(s) and the costs and benefits of alternative system(s) would be great.
- b. **CDD Waste.** Both the legislature and the Board of Environmental Protection have been working on this issue with great difficulty. Also, the Task Force deliberation of this issue expresses great concern. Reviewing the economic and environmental impact of various disposal methods would be good.

Recommendation #7: **Support.**

Recommendation #8: **Support.**

MMA Comment: The number one vote-getter of all the topics discussed in the afternoon sessions at the second meeting was: "Do we need additional capacity?"

Recommendation #9: **Qualified Opposition.**

MMA Comment: MMA generally supports follow-up analyses to look at performance. However, Recommendations #'s 2, 5, 6, 7 and 8 are all studies and analyses and Recommendation #1 is an annual meeting for which preparation will be needed and Recommendation #10 is more education. SPO is proposing to take on a lot. I don't know that you need to go out and see how many old lightbulbs are sitting in recycling sheds built with state funds. If you really think you can do all this work, we're

not opposed, but this is a much lower priority for us compared to some of the other studies.

Recommendation #10: Qualified Opposition.

MMA Comment: MMA generally supports education and outreach efforts. However, money is scarce and as long as there is demand for grants for actual recycling efforts (hazardous waste days, sheds etc.). I believe municipalities would prioritize funding work over funding more education at this point. If more education is needed, it should be very focused on particular items (composting etc.) rather than just generic recycling. I wouldn't anticipate strong municipal feelings either way.

Sorry I can't make the meeting. Hope this helps.

Yours,

Jeffrey Austin
Legislative Advocate
Maine Municipal Association